Before the

Federal Communications Commission

Washington, DC 20554

In the Matter of

Advanced Television Systems and Their Impact upon Existing Television Broadcast Service	))))	MM Docket No. 87-268

COMMENTS OF THE LOS ANGELES BROADCASTERS FOR A COMMON TRANSMISSION SITE

The Los Angeles Broadcasters for a Common DTV Transmission Site represent three of the eighteen stations located in the Los Angeles area. The stations are KSCI, KZKI, and KRPA. The stations are working together to request that all DTV transmission in the Los Angeles area originate from the single co-located site of Mt. Wilson. The stations are submitting comments that would reduce interference and provide more available channels to the congested Southern California area.

1. Digital TV Service Area

Local terrain and antenna patterns must be considered when assigning channels to maximize interference-free coverage.

2. Spectrum for DTV Proposals (Core Spectrum)

DTV should be implemented in a core spectrum of contiguous UHF channels. This simplifies receiver design and receiver antenna problems. In many of the major markets, channels 14 through 20 have already been assigned to and, are in use by, Land Mobile Service.

It does not appear practical to assign a DTV station adjacent to Land Mobile frequencies without causing interference to the Land Mobile users. In Los Angeles, UHF channels 15, 17, 19 and 21 will be unusable for DTV due to Land Mobile adjacencies.

We recommend that the DTV core spectrum be channels 22 through 66. This releases the present VHF spectrum and makes channels 14 through 21 contiguous with existing Land Mobile spectrum now ending at 470 mHz. Channels 67 through 69 would also be released, thus retaining the same number of channels available for broadcasting as recommended by the FCC.

3. Allotment Preference

In order to minimize interference, high differential power levels between stations is undesirable. We recommend that, during the transition period, all stations in the market be assigned the same Effective Radiated Power adjusted for free air attenuation of the higher frequencies.

4. Assignment Methodology

Assignment of DTV frequencies should not only be concerned with the present situation but with the alignment of stations after the full conversion to DTV. If possible, stations should not be required to move more than once. Stations assigned to the core band should be allowed to exchange their assigned DTV channel with their NTSC channel.

5. Use of Existing Transmitter Sites

Five of the 17 operating NTSC stations in the Los Angeles area (KSCI, KZKI, KOCE, KDOC and KRCA) operate from transmitting sites other than Mt. Wilson, the common site for the other 12 stations. A sixth "taboo" station, KRPA, is under construction. These six stations are located on their present sites due to the old UHF taboo rules. The taboo stations have significant

shadow areas and receiving antenna orientation problems. The old taboo rules should not be considered in making DTV allocations.

The characteristics of the DTV signal make a common community transmitting area/site highly desirable. This would encourage shared facilities, towers and antennas when practical.

Due to the large number of stations serving Los Angeles and surrounding areas, there are not enough interference free channels to provide each existing station with an acceptable DTV channel. Co-locating all DTV stations in the area at one site would help reduce interference and could provide more available channels. A common site would reduce or eliminate receiving antenna orientation problems and better serve the viewing public.

6. Existing Vacant Allotments, New NTSC Applications

Assigned construction permits that have not started construction by a specified date should be allowed only one frequency for NTSC or DTV. If the station constructs an NTSC station at a site other than the community DTV site, the station may later choose to convert to DTV on the same frequency and relocate to the common community antenna site.

7. Land Mobile sharing

In the event that the above core spectrum approach is not implemented, it must be considered that the use of Land Mobile service on channel 20 prevents the use of two DTV channels. Such Land Mobile services should be required to move off DTV frequencies.

8. Technical Concerns

In order to reduce interference between stations, carriers and subcarriers of all NTSC and DTV transmitters should be referenced to a common frequency standard such as the GPS system.

9. Use of Frequency Coordinators

Realizing that congested areas have unique problems, we recommend that the FCC assign regional coordination areas centered on major metropolitan markets. Regional coordinating committees would be specified as requiring equal representation from all stations requesting representation in the region. These committees would recommend local modifications to the national table of allotments.

10 Sample Allocation Table

The following table is an example of using the previous concepts to build an allocation table. In this example only one station in all of Southern California would not be in the modified core spectrum. Interference between neighboring communities have been reduced as compared to both the FCC plan and the MSTV plan. There is no interference to the present Land Mobile users.

This table was prepared only as a starting point for the allocation of DTV channels. Actual assign channels should be coordinated by all of the local stations.

State	City of License	NTSF Channel	FCC DTV Channel	LABCTS DTV Channel
California	Anaheim	56	38	65
California	Avalon	54	31	54
California	Barstow	64	44	29
California	Corona	52	15	53
California	Huntington Beach	50	49	60
California	Los Angeles	2	48	43
California	Los Angeles	4	32	35
California	Los Angeles	5	33	25
California	Los Angeles	7	53	48
California	Los Angeles	9	47	66
California	Los Angeles	11	59	38
California	Los Angeles	13	21	36
California	Los Angeles	22	60	23

Allocation Table continued.

State	City of License	NTSF Channel	FCC DTV Channel	LABCTS DTV Channel
California	Los Angeles	28	27	27
California	Los Angeles	34	35	33
California	Los Angeles	58	41	59
California	Los Angeles	68	36	
California	Ontario	46	67	45
California	Oxnard	63	24	24
California	Palm Springs	36	57	49
California	Palm Springs	42	43	55
California	Rancho Palos Verdes	44	45	44
California	Riverside	62	26	26
California	San Bernardino	18	19	32
California	San Bernardino	24	25	57
California	San Bernardino	30	55	67
California	San Diego	8	23	49
California	San Diego	10	29	55
California	San Diego	15	17	61
California	San Diego	39	40	31
California	San Diego	51	52	47
California	San Diego	69	46	63
California	Santa Ana	40	66	41
California	Santa Barbara	3	51	50
California	Santa Barbara	38	22	39
California	Twenty Nine Palms	31	28	28
California	Ventura	57	43	51

WHEREFORE, THE PREMISES CONSIDERED, the Los Angeles Broadcasters for a Common Transmission Site respectfully requests the Federal Communication Commission to act in a manner fully consistent with the foregoing statement.

Respectfully submitted,

LOS ANGELES BROADCASTERS FOR A COMMON TRANSMISSION SITE

By: _____
William C. Welty
KSCI, Inc.

Dated: December 12, 1996

WHEREFORE, THE PREMISES CONSIDERED, the Los Angeles Broadcasters for a Common Transmission Site respectfully requests the Federal Communication Commission to act in a manner fully consistent with the foregoing statement.

Respectfully submitted,

LOS ANGELES BROADCASTERS FOR A COMMON TRANSMISSION SITE

By: Francis J. Martin

KRPA, Inc.

Dated: November 21, 1996

WHEREFORE, THE PREMISES CONSIDERED, the Los Angeles Broadcasters for a Common Transmission Site respectfully requests the Federal Communication Commission to act in a manner fully consistent with the foregoing statement.

Respectfully submitted,

LOS ANGELES BROADCASTERS FOR A COMMON TRANSMISSION SITE

By: Francis J. Martin

KZKI, Inc.

Dated: November 21, 1996